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**From:** Rebecca Hollis [rhollis@cleanenergysystems.com]  
**Sent:** 2/5/2020 11:13:41 PM  
**To:** Albright, David [Albright.David@epa.gov]; Ho, Yenhung [Ho.Yenhung@epa.gov]  
**CC:** Natalie Nowiski [NNowiski@slb.com]; Wade Zaluski [WZaluski@slb.com]; Wayne Rowe [rowe5@slb.com]; Julian Enahoro Ogolo [ogolo1@slb.com]; Keith Pronske [klpronske@cleanenergysystems.com]  
**Subject:** RE: CLASS VI DATA CONFIDENTIALITY

Great! Thanks David.

-Rebecca

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**From:** Albright, David <Albright.David@epa.gov>  
**Sent:** Wednesday, February 5, 2020 3:10 PM  
**To:** Rebecca Hollis <rhollis@cleanenergysystems.com>; Ho, Yenhung <Ho.Yenhung@epa.gov>  
**Cc:** Natalie Nowiski <NNowiski@slb.com>; Wade Zaluski <WZaluski@slb.com>; Wayne Rowe <rowe5@slb.com>; Julian Enahoro Ogolo <ogolo1@slb.com>; Keith Pronske <klpronske@cleanenergysystems.com>  
**Subject:** RE: CLASS VI DATA CONFIDENTIALITY

Yes, this approach is acceptable. Thanks, David

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**From:** Rebecca Hollis <rhollis@cleanenergysystems.com>  
**Sent:** Wednesday, February 5, 2020 2:37 PM  
**To:** Albright, David <Albright.David@epa.gov>; Ho, Yenhung <Ho.Yenhung@epa.gov>  
**Cc:** Natalie Nowiski <NNowiski@slb.com>; Wade Zaluski <WZaluski@slb.com>; Wayne Rowe <rowe5@slb.com>; Julian Enahoro Ogolo <ogolo1@slb.com>; Keith Pronske <klpronske@cleanenergysystems.com>  
**Subject:** RE: CLASS VI DATA CONFIDENTIALITY

Thank you for the prompt response, David.

Sounds like we agree on the proposed approach. We will wait to hear from you on whether or not EPA confirms this as acceptable.

We will consult 40 CFR Part 2 – Subpart B for guidance on CBI. Thank you.

Lastly, I will let the team at Schlumberger respond with their proposed method of secure electronic file transfer. I can say the system we have been using for file exchange between CES and Schlumberger has worked well and is pretty user friendly.

Best Regards,  
-Rebecca

Rebecca Hollis  
Director Business Development -

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**From:** Albright, David <[Albright.David@epa.gov](mailto:Albright.David@epa.gov)>

**Sent:** Wednesday, February 5, 2020 2:07 PM

**To:** Rebecca Hollis <[rhollis@cleanenergysystems.com](mailto:rhollis@cleanenergysystems.com)>; Ho, Yenhung <[Ho.Yenhung@epa.gov](mailto:Ho.Yenhung@epa.gov)>

**Cc:** Natalie Nowiski <[NNowiski@slb.com](mailto:NNowiski@slb.com)>; Wade Zaluski <[WZaluski@slb.com](mailto:WZaluski@slb.com)>; Wayne Rowe <[rowe5@slb.com](mailto:rowe5@slb.com)>; Julian Enahoro Ogolo <[ogolo1@slb.com](mailto:ogolo1@slb.com)>; Keith Pronske <[klpronske@cleanenergysystems.com](mailto:klpronske@cleanenergysystems.com)>

**Subject:** RE: CLASS VI DATA CONFIDENTIALITY

Hi Rebecca,

Per our conversation yesterday, I wanted to confirm that the approach we discussed for completing the GS DT upload/submittal is acceptable. Namely, you can redact any confidential business information (CBI) from what you upload to the GS DT and send the CBI separately to EPA – clearly marked as CBI.

As for legal guidance on CBI, please refer to 40 CFR Part 2 – Subpart B.

Lastly, to facilitate transmittal of CBI, it sounded like you all had a suggestion for doing so electronically. If that is your preference, could you please provide a brief explanation of the mechanism you propose to use so that we can run it by our IT folks.

Thanks,

David

David Albright

Manager, Groundwater Protection Section

USEPA Region 9 (WTR-4-2)

75 Hawthorne Street

San Francisco, CA 94105

415 972-3971

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**From:** Rebecca Hollis <[rhollis@cleanenergysystems.com](mailto:rhollis@cleanenergysystems.com)>

**Sent:** Wednesday, February 5, 2020 1:57 PM

**To:** Albright, David <[Albright.David@epa.gov](mailto:Albright.David@epa.gov)>; Ho, Yenhung <[Ho.Yenhung@epa.gov](mailto:Ho.Yenhung@epa.gov)>

**Cc:** Natalie Nowiski <[NNowiski@slb.com](mailto:NNowiski@slb.com)>; Wade Zaluski <[WZaluski@slb.com](mailto:WZaluski@slb.com)>; Wayne Rowe <[rowe5@slb.com](mailto:rowe5@slb.com)>; Julian Enahoro Ogolo <[ogolo1@slb.com](mailto:ogolo1@slb.com)>; Keith Pronske <[klpronske@cleanenergysystems.com](mailto:klpronske@cleanenergysystems.com)>

**Subject:** RE: CLASS VI DATA CONFIDENTIALITY

Good afternoon David,

Thank you again for taking the time yesterday to speak with us regarding confidential business information (CBI) used to develop our Class VI permit application.

Per our discussion, the GS Data Tool is not configured to accept CBI. CES and Schlumberger are concerned that interpretations of purchased (licensed) data included in our permit application files (mainly the Project Narrative) would be in violation of our current license agreements if uploaded as is. So, we discussed a potential path forward where we

remove or redact the confidential plots/charts/images/etc. from the files to be uploaded to the GS Data Tool site. Then separately, transmit the CBI (plots/charts/images/etc.) to EPA via a mutually agreed upon method still TBD, e.g. hard copies, secure online electronic file transfer, etc. This way, 1) EPA will have all the required information necessary to evaluate our permit application, 2) CES-vendor confidential information will be protected, 3) the majority of the application material will be uploaded to the GS Data Tool site, and 4) the public process will not be interfered with (or at least only minimally). CES and Schlumberger estimate only about a dozen images or so would need to be redacted from the application files as they include details from licensed seismic and well data.

When we left the call I believe you were going to confirm that this was an acceptable path forward with EPA. Also, Natalie requested guidance from EPA regarding CBI.

Please let me know if I have correctly captured the discussion and if you have made any progress confirming our path forward.

Thank you again and Happy Wednesday,  
-Rebecca

**Rebecca Hollis**  
**Director Business Development -**

  
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-----Original Appointment-----

**From:** Wayne Rowe <[rowe5@slb.com](mailto:rowe5@slb.com)>

**Sent:** Tuesday, February 4, 2020 11:21 AM

**To:** Wayne Rowe; Albright, David; Ho, Yenhung; Rebecca Hollis; Natalie Nowiski; Julian Enahoro Ogolo

**Subject:** CLASS VI DATA CONFIDENTIALITY

**When:** Tuesday, February 4, 2020 3:30 PM-4:30 PM (UTC-08:00) Pacific Time (US & Canada).

**Where:** Skype Meeting

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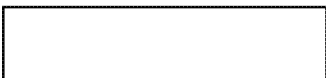
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